

REMARKS

Claims 1-6, 8-15, 19 and 20 are pending in the present application.

Claims 3-6 are withdrawn from consideration.

Claims 1, 2, 8-15, 19 and 20 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over WO 02/24974 taken in view of U.S. 5,114,754 to Cronin et al. Applicants respectfully traverse this rejection.

The U.S. Patent Office (Office) has not established a *prima facie* case of obviousness. In order to establish a *prima facie* case of obviousness, the Office must satisfy three requirements. First, the documents relied upon, coupled with the knowledge generally available in the art at the time of the invention, must contain some suggestion or incentive that would have motivated the skilled artisan to modify a reference or to combine documents. See *In re Fine*, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988). There would have been no reason or motivation to substitute the glycols disclosed in WO 02/24974 with the silsesquioxanes of Cronin to make a wetting agent for joining pre-pregs (polymer materials) to metals. Cronin employs silsesquioxanes layers to passivate metal to inhibit interaction between the metal and a polyimide precursor (Abstract, col. 2, and lines 34-42). The object of Cronin's invention is to restrict interaction between the polyimide and the metal (col. 6, lines 46-51). In contrast, the wetting agent containing the glycols of WO 02/24974 is used to provide contact between a polymeric material and the nooks and crannies of a micro-roughened metal surface (page 9, lines 9-20). WO 02/24974 is doing the opposite of what Cronin desires to do. Accordingly, there would have been no suggestion or incentive to modify WO 02/24974 to include silsesquioxanes.

Second, the proposed modification of the documents must have had a reasonable expectation of success, determined from the vantage point of the skilled artisan at the time the invention was made. See *Amgen, Inc. v. Chugai Pharm. Co.*, 18 U.S.P.Q.2d 1016, 1023 (Fed. Cir. 1991). There would have been no reason or motivation to include the silsesquioxanes of Cronin as a wetting agent in the WO 02/24974 document since the document teaches that suitable wetting agents are to provide contact between the polymer material and the micro-roughened metal. In contrast, Cronin discloses that the silsesquioxanes restrict interaction between polyimides and metal surfaces. Accordingly, the skilled artisan would have had no

expectation of success in including silsesquioxanes in the wetting agent of WO 02/24974 to form a bond between polymers and the nooks and crannies micro-roughened metal layers.

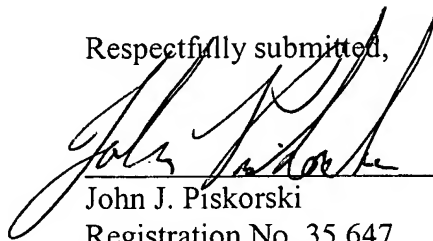
Third, the documents or combination of documents must teach or suggest all of the limitations of the claims. See *In re Wilson*, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970). Neither document alone or in combination teaches or suggests all of the limitations of the presently claimed invention. WO 02/24974, as admitted in the Office Action at page 2, paragraph 2, fails to disclose a silsesquioxane as a primer to form a bond between a polymer material and a roughened metal surface (present claims 1 and 19). Cronin does not make up for the deficiencies of WO 02/24974. As discussed above, Cronin uses silsesquioxanes to restrict interaction between polyimides and metal surfaces, which is the direct opposite of the purpose of the wetting agents of WO 02/24974 as well as the purpose of the primer of the presently claimed invention (see specification, page 10, lines 13-16). Accordingly, the applied documents alone or in combination do not teach or suggest all of the limitations of the present claims.

Applicants respectfully request withdrawal of the rejection of claims 1, 2, 8-15 and 19-20 under 35 U.S.C. §103(a) as allegedly unpatentable over WO 02/24974 taken in view of U.S. 5,114,754 to Cronin et al.

Favorable consideration and allowance of claims 1, 2, 8-15 and 19-20 are earnestly solicited.

Should the Examiner have any questions concerning this response or should she believe this application is for any reason not yet in condition for allowance, she is respectfully requested to telephone the undersigned below to expedite allowance of this application.

Respectfully submitted,



John J. Piskorski
Registration No. 35,647

Rohm and Haas Electronic Materials LLC
455 Forest Street
Marlborough, Massachusetts 01752
Telephone No.: (508) 229-7662
Facsimile No.: (508) 787-4730